



WAC 296-155-775(9) requires the identification of hazardous materials and removal of the hazard before demolition. Lead-based paint is typical in commercial, industrial, and residential properties (residential prior to 1978) and has a specific health and safety regulation regarding worker protection and engineering controls – Washington Administrative Code (WAC) 296-155-176, Lead. For the purposes of this survey, each major paint scheme was sampled and analyzed for lead. Other typical metals, cadmium, zinc etc., will be assumed.

2.3 Sample Collection

The building was occupied during the time of the survey; therefore, there were instances when invasive sampling was not allowed. As a result, some samples of building materials could not be collected. These items are noted in Section 3.1 Notable Items.

Samples were collected in accordance with AHERA, state, and local requirements. Bulk samples were collected in re-sealable plastic bags provided by the analytical laboratory. The chain-of-custody (COC) was completed and signed by applicable personnel.

2.4 Asbestos Sample Analysis

402 samples were analyzed for asbestos by polarized light microscopy using the EPA Method 600/R-93/116. Samples were analyzed by Med-Tox Northwest and NVL Laboratories, Inc., both National Laboratory Accreditation Program (NVLAP)-accredited laboratories. Copies of the NVLAP accreditations are included in **Appendix B**, followed by the analytical laboratory reports **Appendix C**.

2.5 Lead-Based Paint Sample Analysis

Bulk paint chip samples were submitted to NVL Laboratories, Inc., for analysis. A total of 66 paint chip samples were analyzed for lead using atomic absorption spectroscopy (AAS) to determine the presence and percentage of lead. Procedures for analyzing metals are found in the American Society of Testing and Materials (ASTM) D-3335-78 and EPA Method Manual SW-846, Method 6010. Laboratory certification and analytical results are provided in **Appendix D** and **Appendix E**, respectively.

In addition, 6 samples were collected and submitted to NVL Laboratories, Inc., for analysis by toxic characteristics leaching procedure (TCLP). The extraction of the TCLP sample was performed using EPA Method 1311. Analysis was performed using EPA Method 6010 and included all eight RCRA metals. Analytical results are provided in **Appendix E**.

3.0 Asbestos-Containing Materials Inventory

3.1 Building Details

Building 271 – Facilities

The Maintenance Facilities Shop is a 6,000 square foot wood-frame building constructed in 1944 with one floor; the north end was a multi-level theater at one time. It currently serves as an operations base for site building maintenance. Based on review of National Archives and Records Administration (NARA) files, heat for the building was once supplied by an adjacent building (formerly Building 271). Building 271 housed the valve system for distribution of steam throughout the maintenance shop. A steel plate covers the area in the maintenance shop where the former blower and pipes were located. Building features are as follows:

- Construction is typical wood framing with a slab-on-grade foundation. There is an attic crawlspace above the maintenance area of the building (south end) with heating, ventilation, and air conditioning (HVAC) equipment. A steam tunnel was observed and accessed from the boiler room to the shop area; piping had been removed from this area.
- Exterior finishes are stucco attached to a gypsum board with holes for the stucco to penetrate and adhesion of the system. The upper portion of the theater has particleboard siding applied over the stucco as a temporary repair of the stucco system. On the northwest side of the theater, brick has been used as a finish material. There are two types of roof systems; a flat built-up roof and a pitched roof with composition tile roofing.
- Heating systems include two different forced air furnaces, one above the projector room in the theater and one in the attic crawlspace. Originally, the building was heated with steam radiant heaters as evidenced by the old pipe systems originating from the boiler room and distributing throughout the building. The boiler no longer exists but the pipe systems and asbestos insulation (aircell) remains.
- Architectural finishes are spartan and consist mainly of bare concrete floors, suspended ceiling tiles, gypsum wall board, vinyl flooring, and carpeting in some of the offices. Specific finishes follow:
 - The original ceiling system in the theater has been removed and only remnant pieces remain. Above the 2- x 4-foot suspended ceilings of the maintenance area are old 12- x 12-inch glued ceiling tiles.
 - The theater had multiple types of vinyl flooring on the stairs and finished floor. Painted 9- x 9-inch vinyl tile was observed in the main maintenance shop area.

- o Primary wall systems throughout are finished gypsum wallboard. Cement asbestos board (CAB) wainscot was utilized in the restrooms.

Building 267 – Holcenberg Building

This building was constructed by the military in 1944 for base recreation and offices. It has a building footprint of 16,750 square feet and three floors (including the basement). The south end of the second (main) floor is a basketball court. Northwest Center listed the Holcenberg Building as 41,000 square feet, which includes the entire footprint for the first and second floors, and only a portion of the third since the expanse of the gymnasium incorporates the south area of the third floor for mechanical ventilation equipment. The first floor is partially recessed into the ground and is used for file storage, locker rooms, packaging area, and microfilming (data management services). The second (main) floor is used as a gymnasium, weight room, shower room, offices, and workrooms. The third floor is used to organize mailings for house donation pickup. Several restrooms and a mechanical room are also located on the third floor.

There appears to have been multiple renovations of this building. Current Holcenberg building features are as follows:

- There is a concrete basement foundation with concrete wrapped steel pillars supporting the wood floor framing and floors above. The entire structure above the concrete basement is wood framed.
- Exterior finishes are stucco attached to a gypsum board with holes for the stucco to penetrate and adhesion of the system. There are two separate roof elevations, both with the same type of built-up roofing system; silver paint/neoprene membrane/asphaltic layer/foam insulation (2 layers)/wood roof deck. Soffits are finished with CAB including the ceiling of the covered deck area on the lower roof.
- The building has multiple heating and ventilation systems all of which appear to have been added since the original construction. The primary heating system for the building is located on the second level in a mechanical room with stairs leading to the roof. This system has a gas fired forced air furnace distributing heating and air conditioning throughout the building. Originally, the building appears to have been heated with steam or hot water radiant heat. Evidence of the original pipe systems was visible throughout the basement, although the old boiler no longer exists.
- Due to renovations, the architectural finishes for the building vary from floor to floor. The south end of the basement is the only part of the building that appears to have the original configuration and materials (a bowling alley was housed here at one time, but it has been removed). Specific building finishes are as follows:
 - o Walls and ceilings are primarily finished gypsum wallboard systems throughout each floor. However, CAB walls and ceilings were observed in the basement restroom/showers. 2- x 4-foot suspended ceilings have been added on each floor in most cases below the gypsum finishes above.

- o Except for carpet in certain offices, the floors throughout the finished areas are 12- x 12-inch vinyl floor tile; in some cases multiple layers. Gymnasium locker rooms on the first floor have been finished with ceramic flooring over existing flooring.

Building 269 – Pool

The Pool Building is an 8,500 square foot wood-frame structure constructed in 1944, and is currently used for general storage. It is a single story except for maintenance access and mechanical equipment in the spaces surrounding the pool underneath the building. The pool was covered with a floor to accommodate storage of bulk materials. The pool is partially recessed into the ground and there are three water-filled vaults below the pool structure. According to the CDM Phase I Site Assessment, the purpose of the underground vaults is not known. A pool water make-up room is located at the west end of the pool and includes a sump with a sump pump to keep groundwater out of the room. Groundwater is pumped to the storm sewer. Hot water tanks and filters in the pool water room are no longer used.

- This building is a wood framed pool building on a concrete foundation. There is a basement area for the pool mechanical systems (hot water heaters, piping, etc.) and access to the pool walls. The inspectors observed water filled pipe vaults but were unable to inspect, and according to maintenance staff, a pipe chase between buildings is supposed to exist on the site. The pool area has a high ceiling with large rough-hewn wood trusses. Parts of these trusses are wrapped with CAB.
- Exterior finishes are stucco attached to a gypsum board with holes for the stucco to penetrate and adhesion of the system. There are two separate roof elevations, both with the same type of built-up roofing system; silver paint/neoprene membrane/asphaltic layer/foam insulation (2 layers)/wood roof deck. Soffits are finished with CAB including the ceiling of the pool entry area.
- The interior of the pool area is open except for temporary walls that have recently been constructed using gypsum wallboard systems. The pool entry, offices, and locker room walls/ceilings were originally finished with CAB. Most of this remains however, some areas have been repaired with gypsum wallboard systems.
- Flooring throughout the pool building is unfinished concrete except for the pool area that has been covered with wood.

Plants A and C

Plant A, a 19,000-square foot (SF) slab-on-grade building with spread footings, was constructed in 1981-82 and is currently used for thrift sales sorting and industrial laundry services. Plant C, a 12,000-SF slab-on-grade building with spread footings, was constructed in 1984-85 and is currently being used for packaging, paper sorting, and shredding. Construction methods are similar for both buildings although each individual configuration is a little different. Building features are as follows:

- Structurally, these buildings are metal fabricated warehouses on a concrete slab-on-grade foundation. Their internal configuration is mostly unfinished and set up for light industrial type operations. Exteriors are sided with corrugated metal siding. The roof on both buildings is flat with built-up roofing materials.
- Heating systems are gas-fired forced air furnaces located in mezzanine spaces in-between the restrooms (accessed from the maintenance closet). Ductwork to the occupied spaces is insulated with fiberglass (located on the inside of the ducts) and visible throughout the open spaces. There are also overhead electrical heaters in various locations
- Internal walls are a combination of cement masonry unit (CMU) block walls and gypsum wallboard systems. Some offices have drop ceilings with gypsum finishes and others have 2- x 4-foot suspended ceiling systems. Most of the floors are bare concrete, however, 12- x 12-inch vinyl flooring has been used in certain rooms and the bathrooms have ceramic flooring and wall tile.

Building 250 – Plant B

Plant B is a two-story, 19,000-SF wood-frame building. It was originally constructed in 1942 and was remodeled sometime in the 1980s. The building is used for offices, work areas, and training. The second floor consists of the Northwest Center's main office, accounting offices, an HVAC room, boardroom, mailroom, break room, and conference rooms. Two restrooms are located on each floor. Building features are as follows:

- Plant B is a two story wood framed structure on a concrete foundation. There is a crawlspace underneath with limited vertical clearance between the dirt floor and wood joists. Fiberglass batt insulation is visible and falling to the ground in the crawlspace area. It has a flat built-up roof system.
- The current heating system is a gas-fired forced air furnace system. Mechanical spaces were located on the second floor including access to the roof. The original system appears to have been removed except for steam piping and asbestos insulation located inside the crawlspace (asbestos contamination exists from maintenance activities and deteriorating asbestos insulation). Additionally, pipe systems may be hidden inside wall cavities or pipe chases that were inaccessible during this survey.
- Architectural finish systems are similar on both floors which appear to have been renovated during the same construction period. Internal walls and some ceilings are finished with gypsum wallboard systems. Most ceilings are suspended 2- x 4-foot ceiling tiles, which have been installed in some areas below 12- x 12-inch glued ceiling tiles.

Building details and sample locations for all buildings are located in **Appendix F**.

Notable Items

All of the Northwest Center buildings were occupied at the time of the survey thereby limiting destructive investigation. The following specific areas will require investigation prior to demolition and/or renovation:

- Enclosed walls and ceilings of buildings 250-B, 267, 269, and 271 may have hidden asbestos pipe insulation from the original heating systems. These materials were specifically noted in the basement ceilings of building 267 including floor penetrations.
- Assumed cement asbestos water pipe was identified in the pool mechanical area under building 269. This material is more than likely buried throughout the facility and should be dealt with as a unit price for abatement at the time of bidding.
- Carpeting is located over asbestos and non-asbestos flooring in buildings 250-B and 267. The inspectors investigated these areas by pulling up carpeting at corners and other inconspicuous locations while the buildings were occupied, but additional asbestos material, both identified and unidentified, may be hidden where the inspectors could not inspect.
- Maintenance personnel indicated that underground pipe chases were located in-between buildings with asbestos pipe insulation. This was not observed during the survey in any of the buildings or at locations outside of the buildings. An underground pipe chase was observed inside building 271 but no suspect asbestos materials were observed and it did not extend outside the building. Underground pipe chases should be assumed on the property and dealt with as a unit price for abatement at the time of bidding.

3.2 Laboratory Results

A table listing the building materials sampled for asbestos is presented in **Appendix G**. Materials determined to be asbestos containing are detailed in **Table 2**. The material quantities in **Table 2** were derived from dimensions measured in the field and are approximate within plus or minus fifteen percent. The complete asbestos laboratory analytical reports are included in **Appendix C**.

Table 2. Materials Determined Asbestos Containing

Sample Number	Sample Location	Material Description	Asbestos Type And Percentage	Friable	Material Quantity ¹
BUILDING 271 – FACILITIES					
0726BA001	Northwest theater building roof	Built-up roofing	30% Ch	No	1,000 SF
0726BA002	Theater building roof flashing	Black roof sealant	5 - 8% Ch	No	
0726BA014	Theater exterior	Window glazing	2% Ch	No	24 Ea
0726BA029	First floor between projection booth and raised floor	9- X 9-inch beige floor tile Mastic	3% Ch 3% Ch	No	917 SF
0726BA032	Theater steps	9- X 9-inch brick red floor tile Mastic	2% Ch ND	No	
0726BA052	First floor shop floor	9- X 9-inch brown vinyl tile Mastic	2% Ch ND	No	
0726BA062	First floor shop floor	White floor leveling compound Black mastic remnant	ND 4% Ch	No	
0726BA078	First floor restroom	Cementitious wall board (wainscot)	30% Ch	No	300 SF
ASSUMED ACM	Throughout	Pipe fittings and insulation	Assumed	Yes	768 LF
BUILDING 269 – POOL					
0727BA001A	Roof over loading dock	Roofing, rubber membrane, tar, and felt	5% Ch	Yes	7,500 SF
0727BA008	Pool roof	Roofing, rubber membrane, tar, and felt	8% Ch	Yes	
0727BA005 0727BA006	Roof at parapet wall	Black roof sealant	5 -8% Ch	No	
0727BA002	Exterior upper soffits	Fiber insulation (CAB)	30% Ch	No	1,300 SF
0727BA009	Exterior south window	Window glazing	2% Ch	Yes	16 Ea
0727BA015	Wall/ceilings/beam wrap	Cementitious wall board	40% Ch	No	12,430 SF

Sample Number	Sample Location	Material Description	Asbestos Type And Percentage	Friable	Material Quantity ¹
ASSUMED ACM	Pool mechanical room	Cementitious wall board	Assumed	No	350 SF
ASSUMED ACM	Pool mechanical and crawlspace	Pipe insulation	Assumed	Yes	1,295 LF
ASSUMED ACM	Pool crawlspace	Insulation debris	Assumed	Yes	3,000 SF
BUILDING 267 – HOLCENBERG					
0728BA001 0728BA002 0728BA003	Bowling alley	Gray tile Black asphaltic mastic	4% Ch ND	No	12,761 SF
0728BA007	Main hallway	Tan tile Black asphaltic mastic	2% Ch 2% Ch	No	
0728BA011	Main hallway	Beige tile Black asphaltic mastic	2% Ch 2% Ch	No	
0728BA013	East exit from bowling alley	Tan vinyl Gray fibrous backing with mastic	ND 55% Ch		
0728BA017	East of bowling alley floor file storage	Gray tile Black asphaltic mastic	3% Ch 2% Ch	No	
0728BA020	Boiler room and laundry	Tan tile Black asphaltic mastic	4% Ch 2% Ch	No	
0731CIH011	Top of column for suspended ceiling	Ceiling grid adhesive	3% Ch 2% Ch	No	
0801CN025	Main hallway, north end of building	12- x 12-inch light brown vinyl tile Yellow mastic	2% Ch ND	No	
0801CN026	Main hallway, north end of building	12- x 12-inch tan vinyl tile Yellow mastic	2% Ch ND	No	
0801CN037 0801CN038 0801CN039	Lobby area, south wall/near elevator/at column with lock box	12- x 12-inch blue w/white vinyl tile Black mastic	ND 2% Ch	No	
0801CN040 0801CN041 0801CN042	Lobby room near entrance/south wall/near elevator	Tan 12- x 12-inch w/gray & white streaks vinyl tile Black mastic	ND 3% Ch	No	
0801CN043	Main hall, west wall	Brown vinyl floor tile Black mastic	2% Ch 4% Ch	No	
0801CN046	Main hall, west wall	9- x 9-inch red vinyl floor tile Black mastic	4% Ch 5% Ch	No	

Sample Number	Sample Location	Material Description	Asbestos Type And Percentage	Friable	Material Quantity ¹
0801CN049 0801CN050 0801CN051	Main hall, east wall/north east lunchroom/office north east of gym	Green 9- X 9-inch vinyl floor tile Black mastic	4% Ch ND	No	
0802CN-088	Second floor lobby area, south west corner	Yellow mastic 12- X 12-inch light brown vinyl floor tile Black mastic	ND 2% Ch 7% Ch	No	
0802CN-089	Second floor lobby area, south west corner	Carpet mastic 12- x 12-inch blue w/white vinyl floor tile Black mastic	ND 2% Ch 7% Ch	No	
ASSUMED ACM	Exterior soffits	Cement asbestos board	Assumed	No	
ASSUMED ACM	Basement restrooms	Cement asbestos board	Assumed	No	3,903 SF
ASSUMED ACM	Basement and first floor penetrations	Pipe insulation	Assumed	Yes	
ASSUMED ACM	Throughout	Fire door insulation	Assumed	Yes	15 EA
0803CIH195	Building 267 roof center	White/blue rubbery material with fibrous material Silver paint Multi layered black asphaltic fibrous material Brown foamy material	ND ND 25% Ch ND	Yes	16,750 SF
0803CIH196	Building 267 roof south	White/blue rubbery material with fibrous material Silver paint Multi layered black asphaltic fibrous material Brown foamy material	ND ND 15% Ch ND	Yes	
0803CIH197	Building 267 roof north	White/blue rubbery material with fibrous material Silver paint Multi layered black asphaltic fibrous material Brown foamy material	ND ND 15% Ch ND	Yes	

Sample Number	Sample Location	Material Description	Asbestos Type And Percentage	Friable	Material Quantity ¹
PLANT C					
0802CN126	Wing C room 103	12- X 12-inch beige w/white specks floor tile black mastic	2% Ch 4% Ch	No	64 SF
0803CIH209	Wing C, roof west	Silver paint Multi layered black asphaltic material	2% Ch ND	Yes	12,000 SF
0803CIH210	Wing C, roof east	Silver paint Multi layered black asphaltic material	2% Ch ND	Yes	
PLANT A					
0803CIH211	Wing A, roof center	Silver paint Multi layered black asphaltic material	2% Ch ND	Yes	14,000 SF
BUILDING 250 – PLANT B					
0803CN-170 0803CN-171 0803CN-172	Building B hallway 1 st floor	12- X 12-inch floor tile (off white w/gray spec) Mastic	ND 2%	No	19,300 SF
0803CN-179 0803CN-180 0803CN-181	Building B room 106A/bat cave	9- X 9-inch brown w/red streaks floor tile Mastic	3% ND	No	
0803CN-182	Building B room 116	White mastic	2% ND	No	
0803CN-184	Building B room 116	Mastic	3% ND	No	
0803CN-185	Building B room 117	Black substance under wood floor	3%	No	
0803CN-192	Building B room 116	12- X 12-inch floor tile (pink) Mastic	ND 2%	No	
0810CIH023 0810CIH029	Building B room 207 and conference alcove	Red 9- x 9-inch floor tile Mastic	2% Ch ND	No	
ASSUMED ACM	Building crawlspace	Pipe insulation	Assumed	Yes	2,187 LF
ASSUMED ACM	Building crawlspace	Insulation debris in soil underneath piping	Assumed	Yes	5,532 SF
0810CIH048 0810CIH049	Exterior roof	Built-up roofing	5% Ch 8% Ch	No	9,650 SF

¹ Material quantities are approximate, plus or minus 15-percent.

3.3 Materials Determined Non-Asbestos

The materials listed in **Table 3** have been determined by the AHERA Building Inspector to be non-asbestos containing based on analytical results or visual observation:

Table 3. Materials Determined Non-Asbestos Containing

Material	Location	Sample
Building 271 – Facilities		
Composition roofing and felt	Theater building roof	0726BA003
White siding caulking	Theater building roof siding	0726BA007 0726BA008 0726BA009
Exterior siding mortar	Theater roof siding	0726BA010 0726BA011 0726BA012
Stucco exterior siding	Exterior north east theater side	0726BA016 0726BA017 0726BA018 0726BA019
Brick mortar	Exterior west theater side	0726BA020 0726BA021 0726BA022
2- x 4-foot ceiling tile	Old theater ceiling	0726BA023 0726BA024 0726BA025
12- x 12-inch ceiling tile and glue	Above shop suspended ceiling	0726BA026 0726BA027 0726BA028
2- x 4-foot suspended ceiling tile	Central hall and first floor office	0726BA034 0726BA035
2- x 2-foot suspended ceiling tile	First floor center east side office	0726BA036 0726BA037
Blown-in Ceiling Insulation	Attic Crawl Space	0726BA038 0726BA039 0726BA040
2- x 4-foot suspended ceiling tile	First floor shop and office	0726BA041 0726BA042 0726BA033
Duct vibration dampener	First floor below raised floor	0726BA044 0726BA045
Red sheet vinyl flooring felt	First floor on raised floor	0726BA046 0726BA047 0726BA048
White plaster debris	First floor under shop floor in pipe trench	0726BA049 0726BA050 0726BA051
Yellow carpet mastic	First floor north east office	0726BA055 0726BA056 0726BA057

Material	Location	Sample
Yellow mastic	First floor office entry	0726BA058 0726BA059
White floor leveling compound	First floor shop floor	0726BA060 0726BA061
Wall/ceiling tile	Theater wall west	0726BA063 0726BA064 0726BA065
Gypsum wall board	Theater wall east	0726BA066 0726BA067 0726BA068
Gypsum wall board	First floor main hall B	0726BA069 0726BA070 0726BA071
Gypsum wall board	First floor main hall T	0726BA072 0726BA073 0726BA074
Gypsum wall board	First floor restroom hall	0726BA075 0726BA076 0726BA077
Gypsum wall board	First floor north east office	0726BA081 0726BA082 0726BA083
Cove base mastic	First floor hall	0726BA084 0726BA085
Cove base mastic	First floor office	0726BA086 0726BA087
Vibration dampener	Second floor above projection room	0726BA088 0726BA089
Sink undercoat	First floor east theater	0726BA090 0726BA091
White paint	On radiator	0726BA092 0726BA093
Roofing Under Rubber Membrane, Tar, and Felt	Roof over loading dock	0727BA001B
Black roof sealant	Roof at parapet wall	0727BA004
Stucco exterior siding	Exterior south siding	0727BA012 0727BA013 0727BA014
12- x 12-inch beige brick floor tile Mastic	Main floor lunch room	0727BA018 0727BA019
Joint compound on CAB wall board	Main ground keeping and loading corridor	0727BA020 0727BA021 0727BA022
Gypsum wall board	Loading corridor	0727BA023 0727BA024
Ceramic Tile Grout and Mastic	Shower 1	0727BA025 0727BA026

Material	Location	Sample
Ceramic Tile Grout and Mastic	Shower 2	0727BA027 0727BA028
Suspended ceiling tile	Storage	0727BA029 0727BA030
Ceramic tile grout	Pool	0727BA031
Leveling compound	Edge of pool	0727BA032 0727BA033
White paint	Boiler room, floor B	0727BA034 0727BA035
Green paint	Boiler room, floor B	0727BA036 0727BA037
Brown paint	Exterior foundation	0727BA038 0727BA039
Building 267 – Holcenberg		
Black asphaltic mastic on concrete floor	Bowling alley	0728BA004 0728BA005 0728BA006
Blue ceramic tile Grout (gray sandy material)	Men's restroom	0728BA015 0728BA016
12- X 12-inch ceiling tile, Lg/Sm irregular pattern	Mid, north, and south alley	0728BA022 0728BA023 0728BA024
12- X 24-inch ceiling tile, small Hole dot pattern	South alley	0728BA025 0728BA026 0728BA027
12- x 12-inch ceiling tile, plain no holes	Mid, east, and north alley	0728BA028 0728BA029 0728BA030
12- x 12-inch ceiling tile, regular hole pattern	Mid, east, and north east alley	0728BA031 0728BA032
2- x 4- foot suspended ceiling tile, course pattern	North building, doc. Room east of alley, and mid building	0728BA033 0728BA034 0728BA035
2- x 4- foot suspended ceiling tile, fine pattern	By restroom at main stairs, mid. Building, and doc. Room east of alley	0728BA036 0728BA037 0728BA038
6-inch black cove base, brown mastic	East side of bowling alley storage	0728BA039 0728BA040 0728BA041
2.5-inch black cove base, brown mastic	East side of bowling alley file storage	0728BA042 0728BA043 0728BA044
4-inch brown cove base Brown mastic	Big northwest room	0728BA045 0728BA046 0728BA047
4-inch brown cove base Brown brittle mastic	Big northwest room	0728BA048 0728BA049 0728BA050

Material	Location	Sample
Brown ceramic tile and black mastic Gray sandy brittle material	Northwest photo lab	0731CIH001 0731CIH002
Joint compound Gypsum wall board	Boiler room ceiling	0731CIH003 0731CIH004 0731CIH005
Joint compound Gypsum wall board (new)	Northwest building corner	0731CIH006 0731CIH007 0731CIH008
Column felt Mastic	Column, bowling alley	0731CIH009 0731CIH010
Tan/brown paint	Columns and beams	0731CIH013 0731CIH014
Black/tan paint	Columns and beams	0731CIH015
6-inch black cove base Yellow/brown mastic White compact powdery material	Gym	0801CN027 0801CN028 0801CN029
Beige 4-inch cove base Brown mastic	South middle room	0801CN030
Joint compound Gypsum wall board	South middle room	0801CN031 0801CN032 0801CN033
Yellow carpet mastic	Southeast room	0801CN034 0801CN035 0801CN036
White w/gray specks vinyl floor tile Yellow mastic	Office north east of gym	0801CN052 0801CN053 0801CN054
White vinyl tile Yellow mastic	Central lobby area	0802CN055
White 12- x 12-inch vinyl floor tile Yellow mastic	Central lobby area	0802CN056 0802CN057
Yellow carpet mastic	Lobby, north west corner of carpet area	0802CN-058 0802CN-059 0802CN-060
Yellow mastic	Stairwell, top step	0802CN-061 0802CN-062 0802CN-063
2- x 4-foot suspended ceiling tile	Men's restroom	0802CN-064 0802CN-065 0802CN-066
Light blue 4-inch cove base Yellow mastic	Main hall, west side	0802CN-067
Light blue 4-inch cove base Yellow mastic	Main hall, east side	0802CN-068
Light blue 4-inch cove base Yellow mastic	Main hall, south end	0802CN-069
4-inch light gray cove base Yellow and brown mastic	Lobby, north west corner	0802CN-070

Material	Location	Sample
4-inch light gray cove base Yellow and brown mastic	Lobby, south west corner	0802CN-071
4-inch light gray cove base Yellow and brown mastic	Lobby, east side near doors	0802CN-072
Blue 12- x 12-inch ceramic floor tile Yellow mastic Gray sandy brittle material	Men's restroom	0802CN-073 0802CN-074 0802CN-075
9- x 9-inch cork floor tile Brown mastic	Second floor mechanical room	0802CN-076 0802CN-077 0802CN-078
Battleship linoleum Tan woven fibrous material with mastic	Second floor mechanical room	0802CN-079 0802CN-080 0802CN-081
Black asphaltic fibrous felt with mastic on floor	Second floor mechanical room	0802CN-082 0802CN-083 0802CN-084
Red sheet vinyl flooring Black asphaltic fibrous felt with mastic	Top of stairs to roof	0802CN-085 0802CN-086 0802CN-087
12- x 12-inch blue w/white specs vinyl floor tile Yellow mastic	Second floor office #6	0802CN-090
Yellow mastic Battleship linoleum Tan woven fibrous material Black asphaltic fibrous felt material with mastic	Second floor office #6	0802CN-091
Gold carpet mastic	Second floor office #6	0802CN093
6-inch brown cove base Brown mastic	Second floor main office west wall, office #5, and office #3	0802CN094 0802CN095 0802CN096
White sheet vinyl flooring Gray fibrous backing with mastic	Second floor lobby hall near men's restroom	0802CN097 0802CN098 0802CN099
Brown mastic Gray brittle material/leveling compound	Second floor hall near men's restroom	0802CN100 0802CN102 0802CN103
2- x 4-foot suspended ceiling tile	Second floor main office area	0802CN104 0802CN105
Joint compound Gypsum wall board	Second floor mechanical room	0802CN106 0802CN107
Parapet cap screw sealer	Roof parapet	0803CIH198 0803CIH199 0803CIH200
Window glazing (putty)	Second floor, first floor, and basement	0803CIH201 0803CIH202 0803CIH203

Material	Location	Sample
Basketball court window cover sealant	Exterior west side, north	0803CIH204
Basketball court window cover sealant	Exterior west side south	0803CIH205
Exterior stucco siding	Second floor sundeck	0803CIH206
Exterior stucco siding	Above foundation west	0803CIH207
Exterior stucco siding	Above foundation east	0803CIH208
Insulation cover (brown fibrous material with asphaltic material) Brown fibrous material	First floor main center north, south beam	0803CIH214
Duct door insulation	Second floor, duct door	0803CIH215
Vibration dampener	Mechanical room	0808CIH001 0808CIH002
Plant C		
12- x 12-inch blue w/white specks floor tile Black asphaltic mastic	Wing C room 111	0802CN108 0802CN109 0802CN110
12- x 12-inch white w/gray floor tile Black asphaltic mastic	Wing C room 111	0802CN111 0802CN112 0802CN113
Leveling compound Black asphaltic mastic	Wing C room 111	0802CN114 0802CN115
Gold carpet mastic	Wing C room 111a	0802CN116
12- x 12-inch dark blue w/white specks floor tile Brown mastic	Wing C room 109	0802CN117 0802CN118 0802CN119
12- x 12-inch light blue w/white specks floor tile Yellow mastic	Wing C room 109	0802CN120 0802CN121 0802CN122
12- x 12-inch white w/light blue specks floor tile Yellow mastic	Wing C room 109	0802CN123 0802CN124 0802CN125
Brown ceramic tile White mastic Gray brittle material	Wing C room 104	0802CN129 0802CN130 0802CN131
4-inch black cove base Brown mastic	Wing C room 111	0802CN132 0802CN133 0802CN134
4-inch light blue cove base Brown/white mastic	Wing C room 109	0802CN135 0802CN136 0802CN137
4-inch brown cove base Brown mastic	Wing C room 110	0802CN138 0802CN139 0802CN140
Beige mastic	Wing C room 102	0802CN141
4-inch beige cove base Yellow mastic	Wing C room 102	0802CN142

Material	Location	Sample
White compact powdery material		
Joint compound Gypsum wall board	Wing C room 109	0802CN143 0802CN144 0802CN145
Parapet sealer	Wing C roof center	0803CIH212 0803CIH213
Duct insulation	Loft, wing C internal duct	0803CIH217
Paint on exterior CMU	Wing C exterior	0803CIH218 0803CIH219 0803CIH220
Plant A		
4-inch brown cove base White mastic White brittle material	A wing hallway	0803CN146
4-inch light brown rubbery material Brown mastic White compact powdery material	A wing hallway	0803CN147 0803CN148 0803CN149
4-inch tan cove base Brown mastic	A wing receiving area	0803CN150 0803CN151 0803CN152
2-inch gray ceramic tile White mastic Tan fibrous material Black mastic	A wing women's restroom	0803CN153 0803CN154 0803CN155
White ceramic tile White/yellow mastic	A wing unisex restroom	0803CN156 0803CN157
Fiberglass pipe insulation cover Yellow mastic with white woven fibrous material Off white paper	A wing wash and dry area	0803CN158 0803CN159 0803CN160
Silver paper Yellow mastic with white woven fibrous material Off white paper	A wing wash and dry area	0803CN161
Silver paper Yellow mastic with white woven fibrous material Off white paper	A wing wash and dry area	0803CN162 0803CN163
CMU wall mortar	A-wing receiving area	0803CN-164
Gypsum wall board Joint compound	A-wing room 102	0803CN-165 0803CN-166 0803CN-167
Duct insulation	Loft, wing a internal duct	0803CIH216

Material	Location	Sample
Building 250 – Plant B		
Leveling compound	Building B room 123	0803CN-168
Leveling compound	Building B room 123	0803CN-169 0810CIH029
12- x 12-inch marble floor tile Mastic	Building B room 119	0803CN-173 0803CN-174 0803CN-175
12- x 12-inch teal w/white spec floor tile Mastic	Building B room 119	0803CN-176 0803CN-177 0803CN-178
Black paper under wood floor	Building B room 116	0803CN-183
Sheet vinyl flooring (white w/blue & orange specks) Mastic	Building B room 123	0803CN-186 0803CN-187 0803CN-188
12- x 12-inch floor tile (white w/tan specks) Mastic	Building B room 118	0803CN-189 0803CN-190 0803CN-191
Brown floor tile with grout	Building B men's bathroom 1 st floor	0803CN-194
Brown cove base and adhesive	Building B northeast exit door, room 118 and IT room	0808CIH003 0808CIH004 0808CIH005
Pink cove base and adhesive	Building B middle lunch room	0808CIH006 0808CIH007
Blue cove base and adhesive	Building B room 119, 115, and IT room	0808CIH008 0808CIH009 0808CIH010
Red cove base and adhesive	Building B room 102 and north office adjoining room 102	0808CIH011 0808CIH012
Gypsum wall board	Building B room 124, north stairs, room 118, mechanical room, room 202, It room, and north office/lunch area	0808CIH013 0808CIH014 0808CIH015 0808CIH016 0808CIH017 0808CIH018 0808CIH019
Yellow carpet mastic	Building B rooms 224, 214, and 207	0810CIH020 0810CIH021 0810CIH022
Black slip sheet under wood floor	Building B rooms 207 and 224	0810CIH026 0810CIH027
Beige cove base and adhesive	Building B second floor bathroom, kitchen alcove, and north stairwell	0810CIH031 0810CIH032 0810CIH033
Yellow stair tread mastic	Building B north stairwell	0810CIH034
Black sink undercoating	Building B north kitchen/dining, conference alcove, and room 207	0810CIH035 0810CIH036 0810CIH037

Material	Location	Sample
12- x 12-inch ceiling tile and brown mastic	Building B middle lunch room, IT room, and mechanical room	0810CIH038 0810CIH039 0810CIH040
2- x 4-foot suspended ceiling tile	Building B middle lunch room, room 227 and room 212, north stairs, south stairs	0810CIH041 0810CIH042 0810CIH043 0810CIH044 0810CIH045 0810CIH046
Ductwork fiberglass insulation	Building B mechanical room	0810CIH047
Window glazing (putty)	Building B, 2 nd floor north bathroom, room 207, and room 102	0810CIH050 0810CIH051 0810CIH052
Exterior stucco finish	Building B east/west/north side exterior	0810CIH053 0810CIH054 0810CIH055

4.0 Lead-Based Paint

4.1 Paint Scheme/History

All of the Northwest Center buildings exteriors are painted beige with red trim, interiors are largely white with small areas, trim, and doors in various colors. The original buildings (facilities, pool, Holcenberg, and Building 250-Plant B) have stucco exterior walls with wood or CAB trim. The newer additions (plants A and C) are CMU and metal siding.

4.2 Laboratory Results

Paint chip sampling results are presented in **Table 4**. Measurable lead in any of the samples will require compliance with WAC 296-155-176, Lead. High levels of lead in painted surfaces (typically greater than 1,000 ppm) are an indication that waste designation sampling may fail the dangerous waste regulatory limit of 5 mg/l if component segregation or building deconstruction methods are used. In addition, high exterior levels of lead-based paint may be an indicator of soil contamination from peeling paint and/or building renovations.

Sample results indicate that most renovated areas do not have significant levels of lead in paint. However, in locations where sampling tested original or older un-renovated areas, high levels of lead paint exist, the only exception being Plant A and Plant C, which were constructed in the 1980's when most commercial paints were latex and without the lead pigment or additives.

Table 4. Lead Paint Chip Sample Results

Sample Number	Paint Color	Substrate	Component	Result (mg/Kg)
BUILDING 271 – FACILITIES				
0726BA-Pb01	Yellow	Wood	Shop exterior door	7100.0
0726BA-Pb02	Light blue	Wood	Hallway door	2300.0
0726BA-Pb03	Beige	Wood	Exterior trim	2400.0
0726BA-Pb04	Red	Wood	Exterior trim	2600.0
0726BA-Pb05	White	Wood	Interior trim	<50.0
0726BA-Pb06	White	Wood	Key shop	720.0
0726BA-Pb07	Gray	Concrete	Shop floor	<50.0
0726BA-Pb08	Green	CAB	Bathroom	1700.0
0726BA-Pb09	Gray/light green	Wood	Theater door	7000.0
0726BA-Pb10	Orange/gray	Metal	Projector room door	88000.0
0726BA-Pb11	Brown	Wood	Theater door trim	5600.0
BUILDING 269 – POOL				
0727BA-Pb001	Beige	Stucco	Exterior siding	63000.0
0727BA-Pb002	Brown	Wood	Exterior trim	10000.0
0727BA-Pb003	White	CAB/Wood	Walls	2100.0

Sample Number	Paint Color	Substrate	Component	Result (mg/Kg)
0727BA-Pb004	Pink	Wood	Women's bathroom	7400.0
0727BA-Pb005	Yellow	CAB	Wall	590.0
0727BA-Pb006	Green	Concrete	Pool surface	<200.0
0727BA-Pb007	Blue	GWB	Southwest entry	5000.0
0727BA-Pb008	White	Concrete	Wall in shower	1700.0
0727BA-Pb009	Beige	CAB	West bathroom	3200.0
0727BA-Pb010	Green	Wood	Loading dock corridor door trim	8000.0
0803CIH-235Pb	Blue	Metal	Boiler	8900.0
BUILDING 267 - HOLCENBERG				
0731CIH-016Pb	Black/yellow	Plaster	Pillars/beams	11000.0
0731CIH-017Pb	White	GWB	Walls/ceiling	<50.0
0731CIH-018Pb	Beige	Concrete	Walls/pillar	<48.0
0731CIH-019Pb	Gray	Metal	Door frames	<49.0
0731CIH-020Pb	Gray	Wood	Window frames	2500.0
0731CIH-021Pb	Yellow	GWB	Walls	1400.0
0731CIH-022Pb	Yellow	Metal	Door/window frame	2700.0
0731CIH-023Pb	Gray	GWB	Walls	3900.0
0731CIH-024Pb	Green	GWB	Walls	15000.0
0801CIH-221Pb	Gray	GWB	Women's' locker room	4700.0
0801CIH-222Pb	Blue	Wood	Walls	<49.0
0801CIH-223Pb	Dark gray	Metal	Door frames	<81.0
0801CIH-224Pb	Yellow	Wood	Door of north east office off of basketball court	5500.0
0801CIH-225Pb	Gray	GWB	Office wall	<49.0
0801CIH-227Pb	Yellow	Metal	Door frame	950.0
0801CIH-228Pb	Dark blue	Gwb	Basketball court south west exit hall	<50.0
0801CIH-229Pb	Light blue	Plywood	Basketball court wall	<50.0
0801CIH-230Pb	Beige	GWB	Weight room south west of basketball court	<50.0
0801CIH-231Pb	Blue	GWB	Music room north west of basketball court	<49.0
0801CIH-232Pb	Green	Drywall	Mechanical room wall	14000.0

Sample Number	Paint Color	Substrate	Component	Result (mg/Kg)
0801CIH-233Pb	Green	Wood	Mechanical room on second floor	14000.0
0801CIH-234Pb	Yellow	Wood	Basketball court ceiling	680.0
BUILDING 250 PLANT B AND PLANT A AND C				
0803CIH-236Pb	White	CMU	Walls	<91.0
0803CIH-237Pb	Gray	Concrete	Floor	<47.0
0803CIH-238Pb	Gray	Wood	Ceiling	<50.0
0803CIH-239Pb	White	Gypsum	Wall	<50.0
0803CIH-240Pb	Blue	Gypsum	Room 109 wall	<49.0
0803CIH-241Pb	Light blue	Gypsum	Room 110 wall	<49.0
0803CIH-242Pb	Gray	Metal	Door trim	<56.0
0803CIH-243Pb	Gray	Gypsum	Shredder room wall	<49.0
0803CIH-244Pb	Blue	Metal	Shredder room door	<50.0
0803CIH-245Pb	Beige	Gypsum	Shredder room wall	<50.0
0803CIH-246Pb	Light blue	Gypsum	Lunchroom wall	<50.0
0803CIH-247Pb	Beige	Metal	Door trim	260.0
0803CIH-248Pb	White	Gypsum	Wall	<48.0
0803CIH-249Pb	Blue	Wood	Lunchroom trim	<50.0
0803CIH-250Pb	Beige	Stucco	Exterior wall	440.0
0803CIH-251Pb	Brown	CMU	Exterior wall	<49.0
0803CIH-252Pb	Beige	Metal	Exterior wall	280.0
0803CIH-253Pb	Red	Metal	Exterior wall	<49.0
0803CIH-254Pb	Gray	Wood	Ceiling	79.0
0803CIH-255Pb	Turquoise	Wood	North office	<49.0
0803CIH-256Pb	Brown	Wood	Office ceiling	<65.0
0803CIH-257Pb	Maroon	Gypsum	Entry wall	<47.0

A representative building material sample was collected from each building representing non-recyclable demolition debris. The sample was tested by Toxicity Characteristic Leaching Procedure (TCLP) analysis to determine waste disposal requirements. Sampling results indicate concentrations below the definition of hazardous waste (5 mg/L) for each building; see **Appendix E** for analytical results. Recyclable materials not included in the building waste streams included painted and non-painted metal, painted and non-painted concrete, and window/door glass.

5.0 Potential PCB-Containing Equipment

5.1 Fluorescent Light Ballasts

Due to building occupancy at the time of the survey, fluorescent lights were not dismantled and checked for "non-PCB" labels. Additionally, considering the age of buildings 250-Plant B, 267, 269, and 271 there is likely PCB ballasts dispersed throughout each building regardless of when certain renovations occurred. The following table lists the number of fluorescent fixtures and the number of ballasts associated with each fixture in the buildings. Ballasts, PCB or di-electric fluid type, should be recycled or disposed as hazardous waste during demolition and therefore all of the fluorescent fixtures have been summarized in Table 5.

Table 5. Fluorescent Light Ballasts

Building Location	PCB Light Ballasts	8 -Foot Light Tubes	4 -Foot Light Tubes
Plant-A	0	332	56
Building 250-Plant B	384	0	768
Plant-C	0	0	406
Building 267 (Holcenberg)	551	2	1120
Building 269 (Pool)	26	10	42
Building 271 (Facilities)	28	22	104
Total Ballasts	989	366	2,496

Fluorescent light tubes contain mercury and should be recycled.

5.2 Electrical Transformers

Electrical transformers observed within the buildings were all dry type transformers. Only oil filled transformers are suspected of containing PCB's.

6.0 Material Identification and Abatement Requirements

According to PSCAA Asbestos Control Standards, friable asbestos-containing material present at the site must be removed prior to any building demolition. Washington Department of Labor and Industries requires all asbestos materials (friable and non-friable) be removed prior to any building demolition (WRD 23.35 describes the only exemptions to this). Med-Tox Northwest recommends that a Washington State certified asbestos contractor, as required by Washington Department of Labor and Industries, perform any asbestos abatement.

The scope of this report consists of identifying ACM, lead-based paint, and potential PCB-containing materials within the building. However, other environmental conditions may impact site conditions, demolition, and site preparation for any new construction. The general recommendation prior to demolition is to empty the entire building, including furniture, cleaning and maintenance supplies, appliances, mechanical equipment, boilers, heaters, air handling units and everything that is not a part of the building construction. Hazardous materials identified at Northwest Center facility, including process equipment, and/or supplies (reference CDM October 2003 Phase I Site Assessment) will need to be removed prior to demolition of the buildings to avoid a release of a hazardous substance.

6.1 Inaccessible Items

Items that were inaccessible during the time of the survey should either be assumed to be ACM or sampled for analysis prior to demolition. All of the buildings were occupied at the time of the survey thereby limiting the amount of destructive investigation that could occur. The following destructive investigation will need to be performed by an AHERA accredited building inspector prior to demolition:

- Enclosed walls and ceilings of buildings 250-B, 267, 269, and 271 may have hidden asbestos pipe insulation from the original heating systems. These materials were specifically observed and noted in the basement ceilings of building 267, including floor penetration insulation.
- Assumed cement asbestos water pipe was identified in the pool-mechanical area under building 269. This material is more than likely buried throughout the facility and should be dealt with as a unit price for abatement at the time of bidding.
- Carpeting is located over asbestos and non-asbestos flooring in buildings 250-B and 267. The inspectors investigated underneath the carpeting in select areas throughout the buildings additional asbestos material, both identified and unidentified, may exist.
- Maintenance personnel indicated pipe chases in-between buildings with asbestos pipe insulation. This was not observed during the survey in any of the buildings. An underground pipe chase was observed inside building 271 but no suspect asbestos materials were observed and it did not extend outside the building. The pipe chase should be assumed and dealt with as a unit price for abatement at the time of bidding.



6.2 Friable and Nonfriable ACM

Friable and non-friable ACM quantities are summarized in **Table 6**. The friable and non-friable materials have been designated for abatement prior to demolition of the Northwest Center facilities. If the buildings are left intact, most of these materials will likely be managed in place. Materials that should be removed as an optimal ACM management control methodology if the buildings remain occupied are summarized in **Table 7**.

Table 6. Asbestos-Containing Materials to Be Removed Prior to Demolition

Sample Location	Material Description	Asbestos Type and Percentage	Condition	Material Quantity ¹
Facilities Building				
Restrooms	CAB wainscot	30% Ch	Good	300 SF
Theater stairs and repair shop	9-inch floor tile	3% Ch	Poor	917 SF
Exterior	Window glazing (putty)	2% Ch	Poor	24 EA
Throughout	Pipe insulation (4 to 6-inch diameter)	Assumed ACM	Fair	768 LF
East exterior	Pipe insulation debris	Assumed ACM	Poor	100 SF
Interior	Fire door insulation	Assumed ACM	Good	6 EA
Pool Building				
Interior/exterior	CAB wall board, soffits, beam wrap	Assumed ACM	Fair	12,430 SF
Exterior	Window glazing (putty)	2% Ch	Poor	16 EA
Pool mechanical	Pipe insulation (4 to 6-inch diameter)	Assumed ACM	Poor	900 LF
Crawlspace	Insulation debris	Assumed ACM	Poor	3000 SF
Crawlspace/ exterior	Drain pipe	Assumed ACM	Fair	200 LF
Exterior	Roofing	5 -8% Ch	Good	7,500 SF
Holcenberg Building				
Interior/exterior	CAB wall board, soffits	Assumed ACM	Good	3,903 SF
Interior	Vinyl floor tile and mastic	2% Ch	Good/fair	12,761 SF
Basement	Column adhesive	2 -3%	Fair	160 SF
Basement/first floor	Pipe insulation (4 to 8-inch diameter)	Assumed ACM	Fair/poor	1,295 LF
Exterior	Roofing	15 - 25% Ch	Good	16,750 SF
Interior	Fire door insulation	Assumed ACM	Good	15 EA
Plant A				
Exterior	Roofing	2% Ch	- Good	14,000 SF
Plant B				
Interior (all floors)	Vinyl floor tile and mastic	2% Ch	Fair	19,300 SF
Crawlspace, 1 st and 2 nd floors	Pipe insulation (4 to 8-inches diameter)	Assumed ACM	Fair/poor	2,187 LF
Crawlspace	Insulation debris	Assumed ACM	Poor	5,532 SF
Exterior	Roofing	8% Ch	Good	9,650 SF
Plant C				
Interior	Vinyl floor tile and mastic	2 - 7% Ch	Good	64 SF
Exterior	Roofing	2% Ch	Good	12,000 SF

¹ Material quantities are approximate.

Table 7. Asbestos-Containing Materials Suggested To Be Removed as a Management Control Methodology

Sample Location	Material Description	Asbestos Type and Percentage	Condition	Material Quantity ¹
Facilities Building				
Theater stairs and repair shop	9-inch floor tile	2% Ch	Poor	917 SF
Exterior	Window glazing (putty)	2% Ch	Poor	24 EA
Throughout	Pipe insulation (4 to 6-inch diameter)	Assumed ACM	Fair	768 LF
East exterior	Pipe insulation debris	Assumed ACM	Poor	100 SF
Pool Building				
Interior/exterior	CAB wall board, soffits, beam wrap	Assumed ACM	Fair	12,430 SF
Pool mechanical	Pipe insulation (4 to 6-inch diameter)	Assumed ACM	Poor	900 LF
Crawlspace	Insulation debris	Assumed ACM	Poor	3000 SF
Holcenberg Building				
Basement	Column adhesive	2 -3% Ch	Fair	160 SF
Basement/first floor	Pipe insulation (4 to 8-inch diameter)	Assumed ACM	Fair/poor	1,295 LF
Plant B				
Crawlspace, 1 st and 2 nd floors	Pipe insulation (4 to 8-inches diameter)	Assumed ACM	Fair/poor	2,187 LF
Crawlspace	Insulation debris	Assumed ACM	Poor	5,532 SF

¹ Material quantities are approximate.

6.3 Hazardous Materials

The majority of the lights throughout the buildings are fluorescent light bulbs and ballasts. Fluorescent bulbs and ballasts should be cleared from the building and disposed of properly prior to demolition (light bulbs should be recycled). Most asbestos abatement contractors can dispose of ballasts and recycle fluorescent light bulbs.

In addition, the following potentially hazardous materials were noted on the site:

- There is an above ground diesel storage tank located outside and to the northwest of Plant A.